

Part III: Questions an Inspector May Ask While Visiting Your Dry Cleaning Shop

General

Are you aware of the air, hazardous waste, and wastewater regulations that apply to perc dry cleaners?

Do you know how to contact the small business technical assistance program in your state? Have you received any assistance from them?

How do you usually find out about the local, state, and federal environmental regulations impacting your dry cleaning business?

Are you receiving articles to clean from other dry cleaning stores?

Is your store front name the same as your actual company's name?

Hazardous Waste

What environmental permits do you have? Can you show them to me?

Do you have a U.S. EPA Identification Number? If so, what is it? Can you show documentation to support it?



Show me where you store your still residues, spent cartridges, cooked powder residue, and other hazardous wastes. Are the containers kept closed and secured? Are they properly labeled? Do you inspect these containers regularly to make sure they are not leaking?

How often do you fill a 55-gallon drum with hazardous waste?

Do you drain spotting chemicals and other chemicals completely to make sure that the container is legally empty and not regulated as a hazardous waste?

Do you treat your hazardous waste on site, or do you use a hazardous waste transporter to remove it off site?

Show me your manifest logs.

Do you have an emergency plan in case of an accident? Are all employees aware of it?

Are your perc storage tanks diked, and is the dike coated on the inside with a sealer? Could a leak from your perc storage tank be contained?





Air



Have you sent your Initial

Notification Report and your Pollution Prevention

Compliance Report to your EPA Regional Office?

Have you sent your Control Requirements Compliance

Report if a control device is required?

Show me your records of perc purchases and calculations for rolling yearly averages. (These records must be kept in your shop for at least 5 years.)

Do you have a copy of the design specifications and the owner's operation and maintenance manual for your dry cleaning machines and control equipment? Show me your manual. If you do not have one, show me a copy of the EPA document, *General Recommended Operating and Maintenance Practices* (EPA-4531R-94-07), dated October 1994, which you should have on hand instead. Does your manual contain standard operating procedures that could be used as your Startup, Shutdown, Malfunction plan?

If you are operating a refrigerated condenser as control equipment on your dry-to-dry machine, show me how you take a temperature reading for your compliance test. How often do you perform this test? Show me your log where you record this temperature. What do you do if the outlet temperature is above 45°F?

If you are operating a refrigerated condenser or control equipment on your transfer washer, show me how you measure the inlet and outlet temperature difference on the refrigerator condensers. What do you do if this temperature difference is 20°F or less?

When was your carbon adsorber/sniffer installed? How often do you desorb your carbon adsorber? Show me how you take an outlet perc concentration reading. How often do you perform this test? Show me your log where you record the ppm concentration. What do you do if this outlet concentration exceeds 100 ppm?

Show me how you perform your leak detection test. Show me your log where you record findings. How often do you perform this test? Show me your log where you record repair dates and keep orders for repair parts.

Water



Are your pipes and drains connected to the city/town sewer system? Or a septic system?

What steps would you take if you had a perc spill? What would you do if that perc spill reached your drains?

Do you understand the Federal Underground Injection Control Program? Would you like additional information on the program?